

**Exhibit A**

**The Proposed Order**

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

<p>In re:</p> <p>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</p> <p>as representative of</p> <p>THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i>,</p> <p>Debtors.<sup>1</sup></p>	<p>PROMESA Title III</p> <p>No. 17 BK 3283-LTS</p> <p>(Jointly Administered)</p>
<p>In re:</p> <p>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</p> <p>as representative of</p> <p>THE COMMONWEALTH OF PUERTO RICO</p> <p>Debtor.</p>	<p>PROMESA Title III</p>

**[PROPOSED] ORDER GRANTING  
MOTION OF ATLANTIC MEDICAL CENTER, INC.,  
CAMUY HEALTH SERVICES, INC., CENTRO DE SALUD FAMILIAR  
DR. JULIO PALMIERI FERRI, INC., CIALES PRIMARY HEALTH  
CARE SERVICES, INC., CORP. DE SERV. MÉDICOS PRIMARIOS Y PREVENCIÓN  
DE HATILLO, INC., COSTA SALUD, INC., CENTRO DE SALUD DE LARES, INC.,  
CENTRO DE SERVICIOS PRIMARIOS DE SALUD DE PATILLAS, INC.,  
AND HOSPITAL GENERAL CASTAÑER, INC. SEEKING (I) ENFORCEMENT OF  
THE COURT’S PRIOR ORDER AND (II) RELIEF FROM THE AUTOMATIC STAY**

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Upon consideration of the *Motion of Atlantic Medical Center, Inc., Camuy Health Services, Inc., Centro de Salud Familiar Dr. Julio Palmieri Ferri, Inc., Ciales Primary Health Care Services, Inc., Corp. de Serv. Médicos Primarios y Prevención de Hatillo, Inc., Costa Salud, Inc., Centro de Salud de Lares, Inc., Centro de Servicios Primarios de Salud de Patillas, Inc., and Hospital General Castañer, Inc. Seeking (I) Enforcement of the Court's Prior Order and (II) Relief from the Automatic Stay* (Docket No. \_\_\_\_ ) (the "Motion"),<sup>2</sup> the Bacon Declaration and all related filings; adequate notice having been given to all relevant parties; having held a hearing before the Court on \_\_\_\_\_, 2020; objections, if any, to the requested relief having been withdrawn or overruled on the merits; and for good cause shown, it is hereby **ORDERED** that:

1. The Motion is granted as set forth herein.
2. The Commonwealth is hereby instructed to (i) make Quarterly Payments pursuant to the Stipulation and (ii) within two (2) business days of entry of this Order, pay the Shortfall to the Movants.
3. The Commonwealth is hereby instructed to continue to perform under the Stipulation and timely make Quarterly Payments to the Movants.
4. Pursuant to Bankruptcy Code section 362, made applicable by PROMESA section 301(a), the automatic stay is hereby lifted for the limited purpose of allowing the Prepetition Litigation to proceed.
5. For the avoidance of doubt, nothing in this Order shall prevent the Debtors, the Oversight Board, AAFAF or the Movants from seeking or agreeing to a stay of the Prepetition Litigation.

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<sup>2</sup> Capitalized terms used by not otherwise defined herein shall have the meaning given to them in the Motion.

6. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

7. The Court shall retain jurisdiction to resolve any dispute arising from or related to this Order.

Dated: \_\_\_\_\_, 2020

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The Honorable Laura Taylor Swain  
United States District Judge